

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:

**Taylor Madison Francois Bodine
*aka Taylor Francois-Bodine
aka Taylor Bodine
aka Francois Bodine Consulting,***

Debtor.

Case No. 21-11238-KHK

Chapter 7

CONSENT MOTION TO FURTHER EXTEND TIME FOR THE ACTING UNITED STATES TRUSTEE TO OBJECT TO DEBTOR'S DISCHARGE

Comes Now, John P. Fitzgerald, III, Acting United States Trustee for Region Four (the "U.S. Trustee"), and, pursuant to Bankruptcy Rules 4004(b) and 1017(e), hereby requests an extension of time to file a complaint objecting to the discharge of the debtor pursuant to 11 U.S.C. § 727. The Debtor, Taylor Madison Francois Bodine, consents to this further extension of time. In support of his motion the U.S. Trustee states as follows:

1. The Debtor commenced this proceeding by filing a petition for relief under Chapter 7 of the Bankruptcy Code on July 12, 2021. *See Docket Entry #1.*
2. Kevin R. McCarthy was appointed the interim chapter 7 trustee and a 341(a) Meeting of creditors was scheduled for and held on August 18, 2021. He remains the chapter 7 trustee. *See Docket #3.*
3. On November 10, 2021, the Court entered its Order Granting U.S. Trustee's Motion to Extend Time to Object to Discharge of the Debtor (Doc. No. 31) granting the U.S. Trustee through January 17, 2022 to object to the discharge of the Debtor pursuant to §727(a) of

Office of United States Trustee
Kristen S. Eustis, Esq.
1725 Duke Street, Suite 650
Alexandria, VA 22314
(703) 557-7227
Kristen.S.Eustis@usdoj.gov

the Bankruptcy Code. *See Docket entry #31.*

4. By this Motion, the Parties request a further extension of the deadline, through and including **January 28, 2022**, so that the Parties may continue discussions surrounding the U.S. Trustee's Rule 2004 examination of the Debtor.

WHEREFORE, THE UNITED STATES TRUSTEE MOVES THE COURT TO:

- a. Extend the time for filing a complaint objecting to the discharge of the Debtor to **Friday, January 28, 2022;**
- b. Grant such further relief as the Court may deem just and fair.

I ask for this:

January 14, 2022

John P. Fitzgerald, III
Acting United States Trustee, Region Four

By: /s/ Kristen S. Eustis
Kristen S. Eustis, VA Bar # 89729
Trial Attorney
Office of United States Trustee
1725 Duke Street, Suite 650
Alexandria, VA 22314
(703) 557-7227 (Direct Dial)
kristen.s.eustis@usdoj.gov

Seen and Agreed:

Taylor Madison Francois Bodine
Debtor

By: /s/ Robert Sergio Brandt
Robert Sergio Brandt
The Law Office of Robert S. Brandt
600 Cameron Street
Alexandria, VA 22314
Email: brandt@brandtlawfirm.com
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2022, I electronically filed the foregoing consent motion to extend time along with the Proposed Consent Order with the Clerk of the Court and transmitted a true and correct copy of said documents electronically through the electronic case filing system or by first class United States mail, postage prepaid to the following:

Taylor Madison Francois Bodine
42779 Travelers Run Lane
Leesburg, VA 20176
Debtor

Robert Sergio Brandt
The Law Office of Robert S. Brandt
600 Cameron Street
Alexandria, VA 22314
Email: brandt@brandtlawfirm.com, G36549@notify.cincompass.com;lgray@brandtlawfirm.com
Counsel for Debtor

Kevin R. McCarthy
McCarthy & White, PLLC
8508 Rehoboth Ct.
Vienna, VA 22182
Email: krm@mccarthywhite.com, kmccarthy@premierremote.com;DC07@ecfcbis.com
Chapter 7 Trustee

/s/ Kristen Eustis
Kristen Eustis